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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, *et. al.*,

Plaintiff,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, *et. al.*,

Defendants.

Case No. 3:25-cv-1766-EMC

Judge: Hon. Edward M. Chen

DECLARATION OF HEATHER MARTIN

DECLARATION OF TRISTAN ZITTENFIELD
No. 3:25-cv-1766-EMC

1 I, Heather Martin, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746:

2 1. I am the Acting Deputy Chief of Staff at U.S. Citizenship and Immigration Services
3 (“USCIS”). The facts set forth herein are of my own personal knowledge, or known to me based on
4 information and belief.

5 2. I submit this declaration pursuant to the Court’s Order contained within ECF 161 stating:
6 “[t]he government shall immediately ask the 20 custodians at issue whether they used communication
7 means outside of government email and OneDrive with respect to the TPS decisions (e.g.,
8 nongovernment email, text messaging, hard drive).”

9 3. The following custodians at USCIS: Andrew Davidson, Kika Scott, Joseph Edlow,
10 Samantha Deshommes, Connie Nolan, Thomas Perkowski, Jessica Robles, and Emma Krichinsky, were
11 asked whether they used communication means outside of government email and OneDrive (e.g. text
12 messaging, Signal) with respect to the TPS decisions at issue. Jennifer Higgins, who has transferred to
13 FEMA, was also asked the same. After conducting a reasonable search, each of the aforementioned
14 custodians answered “No.”

15 4. Amany Zeldin no longer works for USCIS pursuant to her separation from federal service.

16
17 Executed at Camp Springs, MD on this 5th day of June, 2025.

18 HEATHER A
19 MARTIN

Digitally signed by HEATHER A
MARTIN
Date: 2025.06.05 19:59:22 -04'00'

20 Heather Martin
21 Acting Deputy Chief of Staff
22 U.S. Citizenship and Immigration Services
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